

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Daniel Reinganum
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In Re:

Choates G. Contracting, LLC

Case No.: 21-13085-ABA

Adv. Pro. No.: _____

Chapter: 11

Subchapter V: ☐ Yes ☐ No

Hearing Date: _____

Judge: _____

ADJOURNMENT REQUEST

1. I, Daniel Reinganum, Esq.,

☒ am the attorney for: Choates G. Contracting, LLC,

☐ am self-represented,

and request an adjournment of the following hearing for the reason set forth below.

Matter: Confirmation of Modified Chapter 11 Plan (and deadline to object / vote)

Current hearing date and time: April 27, 2023 at 10:00 am

New date requested: May 11, 2023 at 10:00 am

Reason for adjournment request: To allow Debtor and primary creditors (Philly/Drexel Properties) to attempt to resolve informal objections to plan.

2. Consent to adjournment:

☐ I have the consent of all parties. ☒ I do not have the consent of all parties (explain below):

I have the consent of the Philly/Drexel Properties creditors. I have asked the

Sub-V Trustee and Jeffrey Sponder for their consent, but have not yet heard back.

No party has withheld consent, they simply have not had adequate time. In light of the timing of the request Counsel submits this Adjournment Request prior to hearing back from them.

I certify under penalty of perjury that the foregoing is true.

Date: 04/19/2023

/s/ Daniel L. Reinganum
Signature

COURT USE ONLY:

The request for adjournment is:

- | | | |
|--|--|-------------------------------------|
| <input checked="" type="checkbox"/> Granted | New hearing date: <u>5/11/23 @ 10 am</u> | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Granted over objection(s) | New hearing date: _____ | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Denied | | |

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.